



September 2, 2010

Project No. 943-6222

Chief, New Jersey Compliance Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
290 Broadway
New York, NY 10007-1866

Attn: Ms. Stephanie Vaughn

**RE: OPERABLE UNIT 3 FEASIBILITY STUDY
PHASE 1 TREATABILITY STUDIES**

Dear Ms. Vaughn:

On behalf of the 216 Paterson Plank Road Cooperating PRP Group (Group) we enclose three copies of the report for Operable Unit 3 Feasibility Study: Phase 1 Treatability Studies. In summary, the report includes:

- The additional groundwater investigation along Gotham Parkway between existing wells RMW-11D and RMW-13D, which yielded results that were consistent with earlier data, although the re-sampling of existing wells showed lower results. Installation of a new monitoring well between existing wells RMW-11D and RMW-13D is proposed, along with redevelopment and confirmatory sampling of the existing wells.
- The additional groundwater investigation in the southern corner of the site to delineate the extent of 1,4 dioxane indicated that, vertically, impacts are limited to the till unit. However, the horizontal extent was not adequately delineated by the additional borings, and so several additional investigation locations are proposed.
- The bench scale treatability testing of in-situ chemical oxidation (ISCO) indicated that activated persulfate treatment can degrade groundwater concentrations of 1,4 dioxane to low levels. Target dosages of sodium persulfate and sodium hydroxide (the activator) for field pilot testing were established.

The report also contains the work plan for Phase 2 Pilot Testing of Enhanced Anaerobic Bioremediation in the Gotham Parkway area, including the arrangement of injection and monitoring wells, proposed dosages of sodium lactate amendment, use of tracers, and the associated monitoring programs.

Please do not hesitate to call if any questions arise during your review of this report.

Very truly yours,

GOLDER ASSOCIATES INC.

A handwritten signature in blue ink, appearing to read 'P. Finn', with a long horizontal stroke extending to the right.

P. Stephen Finn, C.Eng.
Principal

cc: William Warren, Esq.
216 Paterson Plank Road Cooperating PRP Group Technical Committee



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